

EXHIBIT P

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF ROBERT HALL

I, Robert Hall, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as **Exhibit A** to this Declaration is a true and correct copy of my proof of citizenship (birth certificate).

3. On September 11, 2001, I was working for ABM Engineering and was present at World Trade Center Tower #1, B4 Level Pump Shop, working on water filtration “zerns”, when the terrorist attacks of the World Trade Center Towers occurred.

4. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be

compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

5. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: a severe, displaced fracture to my scaphoid bone and severe damage to my ulnar nerve at both my elbow and wrist in my dominant right arm when it was crushed. I had muscle weakness in this arm, persistent numbness, which made my ring and little fingers curl inward, noted in my medical records as a claw deformity. I had three surgeries on my right arm and am totally disabled, unable to perform my previous work activities due to my injuries. I cannot hold or use the tools of my trade as a stationary engineer. I was also diagnosed with PTSD and am unable to work underground or in high buildings, only able to perform sedentary, light duty work. I have a fear of heights and claustrophobia, and avoid elevators and subways.

6. On this day, I was working for ABM Engineering and was in the B4 Level Pump Room when the first plane hit. The 50 Car freight elevator cable was severed and the elevator immediately came crashing down in our work area and my coworkers and I were blown off our feet. My coworkers and I tried to exit the basement through a freight elevator and when we approached one of the elevators, the doors of that elevator exploded into a fireball. I was blown through a steel door. We were able to come out of the basement on the PATH train station onto Vesey Street and immediately saw bodies everywhere on the street. When the second plane hit I was in between the two towers and steel came down killing everyone around me. The man who gave me his phone to use to call my wife was cut in half by a piece of steel that just missed me. I have fear of low flying planes, am anxious going to Manhattan, and am hesitant to go into small cramped rooms or in high buildings. The traumatic experiences during the escape and rescue, seeing dead bodies, debris and shoes all around me, people jumping off the towers, the burning

debris, smoke and carnage made me depressed. I lost one of my 3 best childhood friends and also 6 childhood friends who were police officers or firemen in the World Trade center terrorist attacks, causing me to be depressed and anxious about my future. I am unable to enjoy things I previously was able to do, such as riding my motorcycle or going to the gym. I continue to experience nightmares, which come in waves for weeks at a time. They might go away for a month but they are recurrent throughout my life since September 11, 2001.

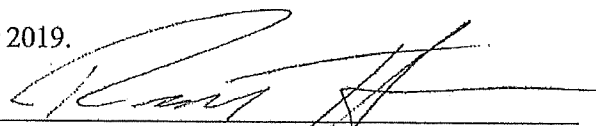
7. I sought medical attention for my injuries. Attached as **Exhibit B** to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I previously pursued a claim (Claim Number VCF 212-002785) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 18th day of December 2019.



Signature of Declarant, Robert Hall

Exhibits Filed Under Seal